

Supporting Statement for Paperwork Reduction Act Submissions

for applications for **Renewal or Re-issuance of Migratory Bird or Eagle Permits** contained in the regulations at 50 CFR 13.21, 13.22.

A. Justification

The following information is provided as part of a request to renew the Office of Management and Budget's approval for information collection pursuant to regulations that implement the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. The information collection requirements are contained in permit applications that will allow for the renewal or re-issuance of migratory bird and/or eagle permits. The Application Form is assigned **Form 3-200-58**. Any annual reports information collections for these permits are captured under supporting statements for the specific permit type in this OMB submission.

This is a new application form, however, it does not represent a new information collection. Permittees have always been able to request renewal or re-issuance of permit. This new form specifically tailored for permit renewals/re-issuance will make the requirements more clear.

1. Renewal or re-issuance of a permit under the MBTA and BGEPA is accomplished through regulations in 50 CFR 13.21 and 13.22. The information collection requirements necessary for the public to apply for renewal or re-issuance of a permit are contained in the current OMB approval under the various specific types of permits. As stated above, this new form specifically tailored for permit renewals and re-issuance will make the renewal/re-issuance requirements more clear.

The appropriate sections of the MBTA and the BGEPA and the implementing regulations mandating or authorizing the collection of information are attached.

2. This collection of information will be achieved using Application **Form 3-200-58**, which addresses the application requirements contained in 50 CFR 22.25. The information received is used by the Service to evaluate whether a permit can be re-issued or renewed under the MBTA and/or BGEPA.

3. To date, the electronic submission of the application is not possible. We must receive an originally signed application form. Facsimile and e-mailed signatures are not accepted, although applicants may submit supporting materials by facsimile transmission. We expect that as technology advances, we will be able to accept electronic submissions of applications. Therefore, we have changed the format of page 1 of the application form so that the information fields on the form correspond to the data fields in our Service-wide permit issuance and tracking computer system. Once the form is approved, it will be posted on the Internet in a format that will allow the public to complete the form on-line and print the completed form for signature and submission.

4. No duplicate information is collected elsewhere in the Service that could be used to decide

whether this permit can be issued or whether a permittee is in compliance with his/her permit. Except for general information such as name and address, no other Federal agency collects information of this kind.

5. The Service estimates that 4,000 small businesses and/or small entities annually submit applications for that contain these information collection requirements. This application has been developed to clarify and simplify the renewal requirements.
6. The consequence of not collecting the information contained in this application form is that the applicant would not be issued a permit since the collected information is either required on the permit itself or needed to make the legal findings and determinations under the BGEPA and the MBTA.
7. It is not anticipated that a respondent would have to address any of the information collection methods or circumstances described in this justification instruction.
8. We will request comments on this information collection in a Federal Register notice.
9. There is no provision within the BGEPA or the MBTA to provide any gift or payment to respondents.
10. Since the information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act, the Service can assure confidentiality to respondents. All applicants receive an information sheet explaining the requirements of both Acts.
11. None of the information collected on this application form is of a sensitive nature.
12. Service experience indicates that approximately 7,444 respondents will apply for renewal or re-issuance of an MBTA or BGEPA permit each year. The frequency of response is on occasion. It will take the respondent an average of 15 minutes (0.25 hours) to complete the application, with a total burden assumed by all applicants of 1,861 hours. We estimate that 4,000 small businesses and/or small entities submit applications or reports annually that contain these information collection requirements. Assuming an hourly cost of \$10.00 yields \$ 10,000 plus a \$25.00 application fee (\$ 100,000), totaling \$ 110,000. All other applicants for permit renewal or re-issuance are individuals.
13. The annual "out of pocket" cost to the respondents is approximately \$ 186,100 (7,444 applicants multiplied by the \$25 application processing fee).
14. The annualized cost to the Federal Government for processing the applications is approximately \$ 200,634. This value is based on the average salary per hour of the Service personnel likely to be involved in the processing of the applications and reports (\$17), plus operational expenses per hour (\$4), multiplied by the estimated average number of hours required to process an application (2), multiplied by the number of applications the Service receives each year (4,777).

15. Any change in estimated annual burden on the public or cost to the Government is likely a reduction resulting from our adjustment of our information collection analysis to differentiate between new permit requests (i.e., respondents) and requests to renew existing permits that are due to expire. This streamlined renewal application is significantly quicker and easier for the public to complete. Renewal or re-issuance respondents previously were included in the respondent and burden statistics for the supporting statements for the various individual types of permits.

16. There are no plans for publication of the results of this information collection.

17. The Service is not seeking approval to not display the expiration date for OMB approval.

18. There are no exceptions to the certification statement contained in Item 19 of OMB Form 83-I for the information being collected by this application form.

B. Collection of Information employing Statistical Methods.

No statistical methods are used.